UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
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Seattle, WA 98101-3188

REGIONAL
ADMINISTRATOR'S
DIVISION

September 16, 2022

Shirley Schultz
Development Services
City of Tacoma
747 Market Street
Tacoma, Washington 98402

Dear Ms. Schultz:

Thank you for providing the U.S. Environmental Protection Agency an opportunity to review recently provided Reports supporting the permit application to the City of Tacoma for the Bridge BNSF Warehouse Project (LU21-0125; EPA number 22-0016-SEPA) in Pierce County, WA in accordance with Washington State Environmental Policy Act (SEPA). The proposed project, located southwest of Interstate 5 and State Route 16 interchange, includes developing a 156 acre-site with buildings, parking lots, and a road with sidewalks. Up to 113 acres of impervious surface will be created, with traffic increase by nearly 4,980 new weekday daily trips, including over 1400 trips by trucks.

The project proposes to develop a large area in an historically overburdened and underserved community. On March 10, 2022, EPA provided input on this project during the SEPA public comment period, emphasizing this project's potential impacts on remedial activities at the Commencement Bay/South Tacoma Channel Superfund Site, South Tacoma Field (Operable Unit 4). Since the initial SEPA analysis, EPA has received correspondence from community members over concerns about the project's impacts on the community. EPA has engaged with the City of Tacoma and Washington State Department of Ecology about the community concerns.

In reviewing the additional Reports, specifically air quality and transportation reports, EPA is concerned that the proposed project may result in disproportionate impacts to communities with environmental justice and equity concerns from increased air emissions and proximity to transportation. EPA recommends that the Applicant coordinate with Washington State Departments of Ecology and Social and Health Services, as well as local air agencies and boards to ensure the project will be implemented in ways that protect human health and the environment. Our detailed comments and recommendations are attached.

Thank you again for the opportunity to comment on this project permit application. If you have questions about EPA's comments, please contact Theo Mbabaliye of my staff at (206) 553-6322 or at mbabaliye.theogene@epa.gov.

Sincerely,

REBECCA CHU
Digitally signed by REBECCA CHU
Date: 2022.09.16 09:03:58 -07'00'

Rebecca A. Chu, Chief
Policy and Environmental Review Branch

US EPA Comments on the Permit Application for the
Bridge BNSF Warehouse Project (LU21-0125)
Pierce County, WA

Potential impacts to air quality

EPA recommends the final SEPA document for the proposed project:

- Estimate air emissions from all sources (e.g., stationary and mobile sources) for the analysis area; discuss the timeframe for release of these emissions; and determine whether the emissions will exceed National Ambient Air Quality Standards (NAAQS). For accurate air emission estimates, use the latest version of EPA's Motor Vehicle Emission Simulator (MOVES3).[1] Using the California Emissions Estimator Model version 2020.4.0 (CalEEMod) for the project is inappropriate since it is specific to the state of California.
- Include a summary of the project-related Mobile Source Air Toxics analysis results using the most recent EPA model for analysis of these emissions and related health risks.[2] If there will be significant air toxics emissions, consider giving preference to contractors using highest engine Tier available (Tier 3 or 4) machinery to reduce air toxics emissions during implementation of the project. During project operation, the documents indicate there will be up to 706 truck trailers and 1,785 passenger vehicles per weekday traveling to and from the project site, and 52 natural gas fired heaters. As these numbers do not account for the project construction and decommissioning phases and overall cumulative traffic in the area, it is possible that mobile source air toxics emissions from the project and other surrounding sources could be significant and warrant further analysis.
- Ensure the above analyses include off-site mobile source air emissions of vehicles and trucks along likely corridors to and from the facility from both the construction and operations of the project with respect to criteria air pollutants and air toxics, including diesel particulate matter emissions. When assessing these impacts, in addition to residential communities by the project site and along corridors to the site, consider sensitive receptors and vulnerable populations such as communities with Environmental Justice (EJ) concerns, park/recreational users, schools, daycares, seniors/nursing homes, hospitals, and other healthcare facilities. The air quality analysis states that, "health-related risks associated with diesel exhaust emissions were not modeled since the most serious health impacts are related to long term exposure." Providing a diesel exhaust emissions analysis of the long-term increased truck traffic and its impact on the surrounding community will be helpful.
- Identify appropriate mitigation measures and best management practices to reduce emissions and comply with federal and state air quality regulations. One resource that may be helpful in identifying mitigation measures and BMPs is the *Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act*.[3]
- Discuss plans to monitor air quality in the project area and take corrective action if the NAAQS are not met. This is important because there are sensitive receptors in the project area and motor vehicle traffic will increase in the area due to the project. Localized air quality conditions can also be substantial (e.g., during wildfire burns), even though area-wide and/or long-term emissions monitoring may show compliance with NAAQS. Although background concentrations of criteria pollutants within the analysis area may be currently below standards, there is potential for significant local air emissions from the project due to fugitive dust releases during ground

[1] https://www.epa.gov/moves/latest-version-motor-vehicle-emission-simulator-moves.
[2] https://www.epa.gov/national-air-toxics-assessment.
[3] https://oag.ca.gov/sites/all/files/agweb/pdfs/environment/warehouse-best-practices.pdf.

disturbing activities and cumulative effects from surrounding activities. Changes in climate for Washington also indicate there will be larger and more frequent wildfires, which may exacerbate air conditions locally.[4] The air quality analysis does not currently include data to show the extent to which these sources of emissions maybe impacting the NAAQS. Consideration of the cumulative health impacts caused by the project (construction, operation, and maintenance phases) and other sources to communities with EJ concerns will also be important, as well as coordination with public health agencies and industry, which often have data on human health and environmental hazards.

- Clarify whether the project analysis area or vicinity are in maintenance area for criteria pollutants, which air pollutant(s) are affected, and when the maintenance period, if any will end or be renewed. If the site is in maintenance and a conformity determination analysis is conducted, then, provide results of such analysis in the SEPA document. Given that the project area may have had a history of air quality exceedances, it will be prudent to monitor air locally and take corrective action if NAAQS are exceeded, even if temporarily.
- Provide information on coordination with other entities in the area, such as the State of Washington Departments of Ecology and Social and Health Services and local air organizations, to ensure emissions due to the proposed project are reduced and mitigated throughout the proposed project lifespan.

Potential impacts on communities with Environmental Justice (EJ) concerns

Assessing EPA's Environmental Justice Screening and Mapping Tool (EJScreen) information is a useful first step in understanding or highlighting locations that may be candidates for further review or outreach.[5] EPA considers a project to be in an area of potential environmental justice (EJ) concern when an EJScreen for the impacted area shows one or more of the EJ Indexes at or above the 80th percentile in the nation and/or state. EPA ran an EJScreen with a 1-mi buffer around the project area and found that 11 out of the 12 EJ Indexes exceeded the 80th percentile when compared to the state.

EPA also recommends considering the Washington State DOH Environmental Health Disparities (EHD) map.[6] The EHD map depicts cumulative health impact as a ranking from 1 to 10, with 10 indicating the highest impact. These rankings reflect the risk each community faces from multiple environmental hazards and the degree to which a community is more vulnerable to those hazards because of certain sociodemographic factors. Rankings for this map can be interpreted as a way to measure relative environmental risk factors in communities. The project area and the surrounding census tracts all rank at 10.

These screening tools indicate that the proposed project is located within an area with EJ concerns and that these communities face significant environmental disparities. Considering the project's potential disproportionate impacts to communities near the project site, EPA recommends the SEPA analysis for the project:

- Include a more robust analysis of the project's impacts to communities with EJ concerns including but not limited to public health impacts; public safety; emergency response time and ability; community cohesion; and property values. EPA is concerned that the project development will further exacerbate a historically over-burdened community.

[4] https://cig.uw.edu/wp-content/uploads/sites/2/2021/12/Northwest-Climate-Assessment-Report-Two-Page-Summary-2.pdf
[5] https://ejscreen.epa.gov/mapper/
[6] https://doh.wa.gov/data-and-statistical-reports/washington-tracking-network-wtn/washington-environmental-health-disparities-map.

- Based on the size and scale of the project and the historic context of the community, conduct additional analysis to better understand the full range of impacts to the community and to help identify appropriate mitigation measures.
- Evaluate the project's cumulative effects to EJ communities. EPA has concerns that the cumulative impacts of this project and the historically over-burdened nature of the area could have significant potential disproportionate adverse impacts on communities with EJ concerns.
- Conduct a Health Impact Analysis (HIA). The Air Quality Study states conducting an HIA is unnecessary. This suggestion is premature as the Air Quality Study does not include mobile sources in the assessment. Similarly, because the Air Quality Study does not include mobile sources in the assessment, the study is incomplete and premature in determining that impacts of toxic air pollutants emissions from the project will have an insignificant impact to public health and safety. Resources for conducting HIAs, including the Social Determinants of Health,[7] can be found on CDC FAQs for HIAs in NEPA,[8] and Tacoma-Pierce County Health Departments information on HIAs.[9]
- Discuss plans to meaningfully engage affected communities in decisions about the project. Meaningful participation is based on the proposition that people affected by projects should have a say in the decisions that affect their lives in a significant way. Such involvement may include, but is not limited to:
    - Participation in decisions about project activities that may affect their environment and/or health.
    - Involvement in regulatory agency's decisions.
    - Consideration of community concerns in project decision making processes.
    - Decision makers' efforts to seek out and facilitate the involvement of those potentially affected.
    - Inclusion of an EJ Specialist with experience in addressing public participation on the project review team.

The City of Tacoma previously hosted a public meeting during the first comment period of the SEPA process. Based on the new studies submitted by the applicant, as well as the concerns raised by the community about the projects impacts, EPA recommends the City consider hosting an additional meeting to meaningfully involve the communities impacted by the project.

EPA's Public Participation Guide provides tools for public participation and public outreach in environmental decision-making.[10] EPA also recommends the Guidance for Incorporating Environmental Justice Concerns in EPA's NEPA Compliance Analysis[11] as a resource describing mechanisms of achieving meaningful engagement. EPA also recommends using the previously mentioned State of California's "Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act"[12] for community engagement resources.

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[7] https://health.gov/healthypeople/priority-areas/social-determinants-health.
[8] https://www.cdc.gov/healthyplaces/nepafaq.htm.
[9] https://www.tpchd.org/home/showdocument?id=2373.
[10] https://www.epa.gov/international-cooperation/public-participation-guide.
[11] Environmental Protection Agency. Guidance for Incorporating Environmental Justice Concerns in EPA's NEPA Compliance Analysis, Page 47, Exhibit 4.
[12] State of California Department of Justice. Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act. https://oag.ca.gov/sites/all/files/agweb/pdfs/environment/warehouse-best-practices.pdf. Accessed September 12, 2022.